

# Information Management Advice 18 - Managing records in business systems

## Part 2: Assessing recordkeeping functionality in business systems

### Introduction

Agencies with business systems that contain State records of enduring or high value must implement a management strategy to ensure that all records, including any potentially permanent value records, remain accessible. One strategy is to migrate the records to a new business system.

This Advice will assist agencies to determine if the replacement business system has sufficient inbuilt recordkeeping functionality to maintain records of enduring or high value.

The process outlined here is essentially a gap analysis, comparing the business system with the minimum functional requirements as a benchmark. Before migrating records and decommissioning a legacy system, agencies should assess if the replacement business system has recordkeeping functionality. If there are gaps, the system does not have sufficient recordkeeping functionality. However, agencies may find that when the broader system environment, including business rules and processes, not just software functionality is also considered, recordkeeping requirements are satisfied.

## Step One - Benchmarking the business system

Agencies should use this as this self-assessment tool to benchmark business systems which hold State records of enduring or high value. The process involves examining the business system to identify the data elements and digital objects that make up the content of the record and the management information (or metadata) that must be persistently linked to the record. The system being examined may be a legacy system which is to be maintained for the life of the records, or it may be a new or replacement business system.

The self-assessment process could be framed as a series of questions or a checklist. 'YES' and 'NO' responses determine a pass or fail for each requirement. All requirements **must** be met for the system to achieve adequate recordkeeping functionality.

Answering these questions may involve a mix of software demonstration as well as discussions with relevant business managers, business system administrators and system users to understand software functionality and any related processes and procedures. It is also useful to capture any workarounds that staff may use to deal with software.



For an example benchmarking exercise mapping the minimum recordkeeping requirements to Empower HR software, refer to the Case Study.

Requirement	Explanation	Example
System requirements		
I. Can the system create	The system <b>must</b> keep a fixed	Many business systems allow for
and keep the digital	and complete version of each	continual updating of data and
records you have	record that is defined, whether	do not 'fix' or archive records.
defined?	in documentary form or as a	Such systems may not meet
	collection of data representing a	minimum requirements, and so
	business transaction. Where the	a scheduled migration to an
	record is made up of more than	external EDRMS is
	one component, the system	recommended (export
	must be able to maintain	frequency should be based on
	relationships between all	an assessment of risk).
	components.	
	Note: some business systems	
	allow for the continual updating	
	of information. In systems	
	where the data is continually	
	updated, the option of	
	exporting records to an	
	external recordkeeping system	
	should be employed.	
2. Can the records in the	The system <b>must</b> be able to	An EDRMS such as TRIM allows
system be accessed?	store and retrieve the defined	users to view and/or edit
	records along with their	documents. Metadata about the record is maintained and is
	associated metadata and	retrievable in the properties tab
	including all components of the	for each document.
	records in useable, human-	
	readable form.	Empower functionality supports
	Note: backups are not suitable	the management of the
	systems for maintaining access	Employee lifecycle from
	to enduring or high value	recruitment to termination.
	records.	Employee and Position History
		records are linked to
		documents (such as payslips and
		leave history) and the audit log
		of actions (History Table) on
		the application. These elements
		are all linked using a tab system.

Re	equirement	Explanation	Example
3.	Can the system restrict	rict The system must incorporate If the business system	
	or permit access to the	safeguards based on defined	highly sensitive or confidential
	defined records by	access rules and user	records, consideration should
	specified individuals or	identification to limit who can	be given to exporting them to
	groups?	view or access records and	an external recordkeeping
		associated metadata.	system with more sophisticated
		Most business systems manage	access controls.
		access via user permissions	
		linked to logins.	Empower HR allows multiple
			levels of security. The
			organisational structure links secure controlled access to
			employee information.
4.	Does the system	Systems should be configured so	Some business systems allow
	capture/create and	that they accumulate metadata	users to add information such as
	maintain over time the	for the record as events occur.	title or name.
	minimum required	The metadata <b>must</b> remain	
	recordkeeping	linked to the record even if the	Empower, for example, requires
	metadata?	records are migrated out of the	manual data entry of an
		original system. The system	employee's name. However
		must not permit the removal	most of the other metadata
		or deletion of the metadata.	requirements will be assigned by
		Much of the metadata in	the system and recorded in
		business systems is pre-set in	History Tables.
		the system, imported from	Mapping can assist with ensuring
		another system or is generated	that metadata remains linked to
		as a natural part of the	records for as long as required,
		operation of the system. Some	including through system
		may be added by system users.	migrations.
		Note: Metadata may be applied	
		to individual records or	
		aggregations of records or to a	
		whole system.	
	4. I. Point of capture metadata		
	4.1.1. Unique	The system <b>must</b> be capable of	An identifier is automatically
	identifier	uniquely identifying each record	assigned to a document
		as defined, for example with a	registered into TRIM.
		system generated reference, a	Empower assigns unique
		document number or other	employee number and position
		identifier.	number.

Requirement	Explanation	Example
4.1.2. Title or name	The system <b>must</b> be capable of applying a title or name to a record. The title should assist in identifying the record and should:  • Describe activities and/or subjects documented in the record(s)  • Enable searching  • Provide contextual information.	<ul> <li>Subject line from an email</li> <li>System generated report name</li> <li>Manually entered document title.</li> </ul>
4.1.3. Date of	The system <b>must</b> be capable of	Newer business systems often
creation	capturing and retaining the date of each record's creation to	include capture or create date
	provide evidence of authenticity.	as mandatory metadata.
4.1.4. The creator	The system <b>must</b> be capable of	A person's name, a user ID or a
(person or system)	capturing <b>and</b> retaining	system ID. Most business
of digital records	information about who/what	systems assign a user ID to
	created the record. Examine	business activities and
	any audit or system logs.	transactions.
	Note: this metadata might be	
	gathered from an external	
	identity management system	
	rather than in the system itself.	
4.1.5. The business	The system <b>must</b> be capable of	In Empower, file structures can
activity or process	capturing and retaining	be setup to reflect business unit
documented by	information about the business	relationships down to six levels.
the record	activity or process the record	
	relates to. Typically a business	
	system will not contain an	
	internal classification scheme.	
	For systems that only relate to a	
	limited number of transactions,	
	this metadata may be found in	
	the system documentation,	
	rather than directly associated	
	with every record within the	
	system. This may also be	
	captured in the title (see 4.1.2).	

Requirement	Explanation	Example
4.1.6. The creating	The system <b>must</b> record the	Many business systems offer
application	name and version of the	report customisation options,
	software application used to	including replacing generic logos
	create the record. In many	with company or agency logos.
	business systems this	However, the software and
	information will be automatically	version is sometimes recorded
	generated, and will apply across	in the system audit log.
	aggregates of records. It may be	
	found in audit trail information.	
4.1.7. Record type	The system <b>should</b> be capable	Empower has the capability to
(e.g. letter / memo	of capturing and retaining	be configured as separate
/ report / contract	metadata which indicates the	'applications' (e.g. Recruitment,
/ fax)	record's type or form. In	Pay, Learning and Development,
	business systems there may only	Performance, Health and
	be a limited number of types –	Safety).
	for example reports and	Some of these modules such as
	transactional records. This is	the Pay and Leave applications
	not a mandatory requirement as	have attached audit logs but
	this metadata can be applied via	others do not, particularly those
	another element such as title	modules that are accessed
	(see 4.1.2) and/or at an	through Employee Self Service
	aggregate level (e.g. across the	(ESS).
	entire system).	
4.2. Process metadata	The system <b>must</b> log all subsequent actions, if any,	In many business systems process metadata is kept in
	carried out on the record, such	audit logs, showing which
	as:	officers added, accessed or
	Accessing, modifying,	performed other actions on
	transferring of records  The identification of the	records in the system.
	The identification of the persons or systems carrying	
	out those actions	
	The dates those actions	
	were carried out.	

Requirement	Explanation	Example
4.3. Disposal Metadata	The system must be able to destroy some records (records whose retention period has expired) in a systematic and auditable process.  The system must be capable of capturing and retaining the following metadata for as long as required to account for the disposal of records:  The authorised destruction governing the disposal of the records  The person/role carrying out the disposal.  The date of disposal	Is the deletion of any data or records in the system recorded in the audit log?  An EDRMS system such as TRIM will keep the required metadata about records disposal.  Most business systems are not configured to meet this requirement. However, if the deletion of data is recorded in the audit log, agencies may be able to apply a Disposal Schedule or other destruction authority across aggregates of records.
5. The system must produce necessary reports and exports	The system must be able to export the defined digital records and their associated metadata to another system or to an external medium e.g. a disk or hard drive.  The report/export process should not degrade record relationships, data quality or metadata.  Exports may be a risk based decision and should be subject to a risk management process.  Ideally the records will be exported in non-proprietary	Agencies once kept summary records in paper form, such as staff service cards. Now agencies use human resource management databases or other automated systems that should provide a similar summary record of employment and service history.  In Empower, the summary record for employment and service in an agency not exportable and thus is inadequate to meet the
	formats removing the need to maintain the creating software.  • Mappings help with indicating which metadata elements are required to be exported with records.	requirements for evidence.  However, it is possible to export data into a simple query database. If the metadata elements and business processes that Empower supports are mapped and documented, this requirement may be met.

## Case Study: Example mapping of minimum recordkeeping requirements to Empower

Agency A replaced their old HR system with Empower HR & Payroll software, and now intends to decommission the legacy system. All data, including terminated employee history, has been migrated from the old IT system into Empower. Agency A also uses TRIM.

In Part 1: Checklist for Decommissioning Business Systems, the agency determined that their old system was: "accessible and contains both short term and long-term/permanent records" and that the "Records are covered by a Disposal Schedule." While some records are only short-term, some records in the system need to be retained permanently for eventual transfer to TAHO (under DA 2157 - 12.11.00 Employment Conditions - PERSONNEL).

From Part 1, the recommended management strategy was "Digital records, including any potentially permanent value records, must be maintained by the agency. Migrate long-term/permanent records and associated metadata to an EDRMS or new business system with inbuilt recordkeeping functionality."

Agency A decided to map the minimum metadata requirements to the replacement system to determine if the system had sufficient recordkeeping functionality to keep Summary employee history records (DA 2157 12.11.01):

Requirement Checklist	Minimum Requirements	Empower
I. Can the system create and keep the digital records you have defined?	The system <b>must</b> keep a fixed and complete version of each record that is defined, whether in documentary form or as a collection of data representing a business transaction.  Where the record is made up of more than one component, the system must be able to maintain relationships between all components.	Partly. Empower keeps summary employee history records documenting the monitoring and management of all employees including:  Name  Date of birth  Date of appointment  Work history details  Position/designation titles  Dates positions held  Location of employment  Rates of salaries/allowances
2. Can the records in the system be accessed?	The system <b>must</b> be able to store and retrieve the defined records along with their associated metadata and including all components of the records in useable, human-readable form.	However, the system allows continual updates. To fix the record, a summary history report needs to be registered in TRIM.  Yes. Employee History links to related employee electronic documentation stored on the client LAN/WAN and Intranet.  However, this could be configured to link to TRIM.

Requirement Checklist	Minimum Requirements	Empower	
3. If required, can the system restrict or permit access to the defined records by specified individuals or groups?  4. Does the system captor	safeguards based on defined access to the identification to limit who can view or access records and three types of access column th		
	ng metadata? The system must ata specified in Section 4.	t not permit the removal or	
4.1 Point of capture	4.I.I Unique identifier	Employee ID	
metadata: To be	4.1.2 Title or name	Employee Name	
assigned to records and	4.1.3 Date of creation	System Load Date and Employee	
aggregations of records		Start Date	
	4.1.4 Who/what created the	User ID. All users complete a user	
	record	form, and HR grants access to	
		sections of the database. This user	
		form could be captured in TRIM.	
	4.1.5 The business	Not assigned. However, this is listed	
	function/process it relates to	in Agency A's Information Asset Register.	
	4.1.6 The creating application	Not assigned. Recorded in Agency A's Information Asset Register.	
	4.1.7 Record type (e.g. letter /	Not assigned. Recorded in Agency	
	memo / report / contract / fax)	A's Information Asset Register.	
4.2 Process metadata:	4.2.1 The date of the action	Audit log (bulk transactions)	
Changed access rules,	4.2.2 Identification of	Audit log (bulk transactions linked	
modification to records,	who/what undertook the	to User ID).	
transfer of records	action 4.2.3 What action was	Audit log (bulk transactions)	
	undertaken	Audit log (bulk transactions)	
4.3 Disposal metadata:	4.3.1 The date of disposal	Audit log (bulk transactions).	
•	4.3.2 The authority governing	Not assigned. However, Agency A	
	the disposal of the records	identifies Empower in their version	
		of the Disposal Schedule (DA2157)	
	4.3.3 The person/role carrying	Audit log (bulk transactions linked	
	out the disposal	to User ID)	
	1	1	

Requirement Checklist	Minimum Requirements	Empower
5. Reports and exports	The report/export process should not degrade record relationships, data quality or metadata.	The summary employee record for employment and service is not exportable as a complete record. An exported database with all relationships, queries and metadata
		mapped may meet requirements.

The benchmarking process showed that Empower software can be configured to meet minimum required recordkeeping functionality only if it is considered within the broader system environment.

The Records Manager and Systems Administrator conducted an analysis of the system and performed metadata mappings for the data tables that make up the summary employee records. Empower was listed in Agency A's Information Asset Register (see *Advice 39: Developing an Information Asset Register*) and the findings of the system analysis captured in TRIM as a PERMANENT record.

Agency A implemented a process to capture regular reports of summary employee data in TRIM. Before each major software upgrade and before decommissioning, all tables that make up the summary employee records will be exported into an open-source archival format such as Extensible Markup Language (XML). This process satisfies record retention requirements for Permanent records.

Records must now be maintained in Empower and TRIM until they are ready to be transferred to TAHO. The records in the old HR system can be sentenced as source records using the Disposal Schedule for Source Records (DA 2159) and the system can be decommissioned. See *Part 3: Sentencing records in business systems* for more advice on sentencing the records.

## Step Two - Strategies to bridge gaps in recordkeeping capability

Where the business system is assessed as not meeting the minimum functional requirements, this may be a fundamental inadequacy of the system or because the system has not been configured to perform that functionality.

To address any gaps, agencies should determine if requirements can be built (or retrofitted) into the design of the software or if system add-ons must be developed. Examples include technology fixes, new policies and procedures and increased user training. For a list of practical techniques, see *Toolkit: 4. Strategies for improving recordkeeping functionality in business systems.* 

One common strategy is to link a business system with an EDRMS such as TRIM, and perform regular scheduled actions such as capture reports in approved formats (e.g. PDF/A, RTF or XML). For more information on preservation formats consult *Guideline 19*: Digital Preservation Formats.

Agencies should consider the context in which the business system operates when making decisions about remedial work that may be required. Any decisions to apply technology fixes are risk based decisions and should be subject to a risk management assessment. Agencies are encouraged to include these minimum recordkeeping requirements in all functional requirements specifications for all new business systems to reduce recordkeeping risks.

### Is the business system the best place for all the records?

Where records are identified as having enduring or high value, consideration should be given to whether export from the business system to an external dedicated recordkeeping system is in fact a better option than retaining the records in the business system.

Over time, records in business systems can be subject to a range of risks such as alterations, data cleansing, de-commissioning, upgrades or migrations of the system which can affect the data contained in the system. In addition, records in business systems can suffer from a lack of visibility and/or control by the organisation's records management program. Records captured into dedicated recordkeeping systems such as an EDRMS can be managed using more sophisticated functionality and are at a lesser risk of loss or damage as a result of technology obsolescence and other threats.

#### **Next Steps**

Agencies intending to decommission business systems that contain State records of enduring or high value must determine if the legacy system or any replacement system has sufficient recordkeeping functionality to ensure that the records remain accessible.

If there are gaps, the system does not have sufficient recordkeeping functionality. Agencies should contact TAHO for further advice.

If agencies determine that minimum recordkeeping requirements are met and documented, follow the checklist steps in *Part 1* of this Advice. Once all data and records in the system have been:

- Migrated into a new system that meets minimum recordkeeping requirements,
- Copied and captured into the agency's EDRMS,
- Destroyed,
- Or transferred to TAHO

The legacy system can be decommissioned using standard IT processes for decommissioning.

## **Self - Assessment Summary**

Complete the checklist in *Part 1: Checklist for Decommissioning Business Systems* before using this self-assessment tool to benchmark business systems which hold State records of enduring or high value required to be retained for longer than 5 years.

Before migrating State records from a legacy system to be decommissioned, agencies should use this tool to assess if the replacement business system has sufficient recordkeeping functionality.

Agencies are encouraged to include these recordkeeping requirements in all functional requirements specifications for new business systems.

All requirements must be met to achieve adequate recordkeeping functionality. If there are gaps, the system does not have sufficient recordkeeping functionality.

Agencies may find some recordkeeping requirements are satisfied when the broader system environment (including business rules and processes, not just software functionality) is also considered.

Any decisions to apply remedial fixes to business systems should be subject to a risk management assessment.

For enduring or high value records, TAHO recommends preserving the records in a dedicated recordkeeping system such as an EDRMS.

## **Recommended Reading**

- Guideline 8 Management of source records that have been copied, converted or migrated
- Guideline 17 Managing recordkeeping risks associated with Cloud Computing.
- Guideline 19 Digital Preservation Formats
- Advice 9 Disposal of Scheduled Records
- Advice 10 Disposal of Unscheduled Records and Destruction Authority checklist for unscheduled records
- Advice 14 Recordkeeping Metadata Standard
- Advice 18 Part One: Checklist for decommissioning business systems
- Advice 25 Management of Backups
- Advice 29 Advice for Agencies on Managing Legacy Records
- Advice 37 Keeping Digital Records Accessible
- Advice 38 Information Custodians and Digital Continuity
- Advice 39 Developing an Information Asset Register
- Form AOT 48 Application to Dispose of State Records

#### **Further Advice**

For more detailed advice, please contact:

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- State Records NSW Recordkeeping in Brief 42 Checklist for assessing business systems (2010)
- International Council on Archives, Principles and Functional Requirements for Records in Electronic
   Office Environments Module 3: Guidelines and Functional Requirements for Records in Business
   Systems (2008) published at www.ica.org
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#### **Information Security Classification**

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#### **Amendments in this Release**

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